

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

**NICHOLAS SERVICES, LLC
D/B/A NICHOLAS AIR and
CORR FLIGHT S., INC.**

PLAINTIFFS

VERSUS

Civil Action No. 3:23-cv-448-MPM-RP

**GLASSDOOR LLC, and
JOHN AND JANE DOE(S) 1-30**

DEFENDANTS

**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANT GLASSDOOR LLC'S
MOTION TO DISMISS, OR, IN THE ALTERNATIVE, TO TRANSFER THIS ACTION
TO THE NORTHERN DISTRICT OF CALIFORNIA**

Plaintiffs Nicholas Services, LLC and Corr Flight S., Inc. respectfully submit this Response in Opposition to Defendant Glassdoor LLC's Motion to Dismiss, or in the Alternative, to Transfer to the Northern District of California. (Dkt. 22).

Plaintiffs hereby oppose Defendant Glassdoor LLC's Motion in its entirety, and rely on their Memorandum in Support, filed in conjunction with this Response. Plaintiffs also rely on the following exhibits submitted herewith:

- Exhibit A, Glassdoor Help Center
- Exhibit B, Glassdoor Premium Employer Products
- Exhibit C, Email from Glassdoor to Nicholas Air
- Exhibit D, Affidavit of Peder von Harten
- Exhibit E, Affidavit of Fernando Pineda

RESPECTFULLY SUBMITTED, this the 25th day of January, 2024.

**NICHOLAS SERVICES, LLC
d/b/a NICHOLAS AIR, and
CORR FLIGHT S., INC. *Plaintiffs***

/s/ Edwin S. Gault, Jr.

Edwin S. Gault, Jr. (MSB #10187)

Molly H. McNair (MSB #105706)

FORMAN WATKINS & KRUTZ LLP

210 E. Capitol Street, Suite 2200

Jackson, MS 39201

Phone: 601-960-8600

win.gault@formanwatkins.com

molly.mcnaair@formanwatkins.com

Hannah Katherine Herrin

Internal Counsel

NICHOLAS AIR®

Direct: 662.212.5124

Email: hherrin@nicholasair.com

Attorneys for Plaintiffs